

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INNOVATIVE MEMORY SOLUTIONS,)	
INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 14-1480-RGA
)	
MICRON TECHNOLOGY, INC.,)	
)	
Defendant.)	
)	

**STIPULATION AND [PROPOSED] ORDER
EXTENDING SCHEDULING ORDER DEADLINES**

WHEREAS, on March 12, 2015, the Court entered a Scheduling Order (D.I. 20);

WHEREAS, on July 16, 2020 the Court entered a Revised Scheduling Order (D.I. 118);

WHEREAS, the ongoing COVID-19 pandemic has caused delays in obtaining necessary discovery;

WHEREAS, the parties require additional time to complete discovery;

WHEREAS, the parties believe an approximately 90-day extension of all deadlines is sufficient to complete fact discovery and other deadlines in the schedule;

NOW THEREFORE, it is hereby stipulated and agreed, by and among the parties through their undersigned counsel, subject the approval of the Court, that the deadlines in the Revised Scheduling Order (D.I. 118) are extended as follows:

Deadline	Current Date	Amended Date
Substantial Completion of Document Production	December 2, 2020	March 16, 2021
Discovery Cut-Off	March 2, 2021	June 14, 2021
Opening Expert Reports	April 5, 2021	July 19, 2021
Rebuttal Expert Reports	May 10, 2021	August 23, 2021
Reply Expert Reports	June 4, 2021	September 16, 2021

Completion of Expert Depositions	July 2, 2021	October 14, 2021
Case Dispositive Motions	August 4, 2021	November 16, 2021
Pretrial Conference	December 3, 2021 at 9:00 a.m.	April __, 2022 at __: __ .m.
Trial	December 13, 2021 at 9:30 a.m.	April __, 2022 at __: __ .m.

/s/ Brian E. Farnan

Brian E. Farnan (#4089)
Michael J. Farnan (#5165)
Farnan LLP
919 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

/s/ Frederick L. Cottrell, III

Frederick L. Cottrell, III (#2555)
Travis S. Hunter (#5350)
Tyler E. Cragg (#6398)
Richards Layton & Finger
920 North King Street
Wilmington, DE 19801
(302) 651-7700
cottrell@rlf.com
hunter@rlf.com
cragg@rlf.com

OF COUNSEL:

Edward C. Flynn
Philip E. Levy
Nathaniel C. Wilks
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
(412) 566-6000
EFlynn@eckertseamans.com
PLevy@eckertseamans.com
NWilks@eckertseamans.com

Robert W. Morris
Eckert Seamans Cherin & Mellott, LLC
10 Bank Street, Suite 700
White Plains, NY 10606
(914) 286-6440
RWMorris@eckertseamans.com

*Attorneys for Plaintiff
Innovative Memory Solutions, Inc.*

OF COUNSEL:

Jared Bobrow
J. Jason Lang
Orrick, Herrington & Sutcliffe LLP
1000 Marsh Road
Menlo Park, CA 94025-1015
650-614-7400
jbobrow@orrick.com
jlang@orrick.com

Will Melehani
Orrick, Herrington & Sutcliffe LLP
405 Howard Street
San Francisco, CA 94105
(415) 773-5700
wmelehani@orrick.com

Olamide Olusesi
Orrick, Herrington & Sutcliffe LLP
1152 15th Street, N.W.
Washington, D.C. 20005
(202) 339-8400
oolusesi@orrick.com

*Attorneys for Defendant
Micron Technology, Inc.*

Dated: January 27, 2021

IT IS SO ORDERED, this ____ day of _____, 2021.

District Judge